

1 Lance A. Maningo
2 MANINGO LAW
3 Nevada Bar No. 6405
4 400 South 4th Street, Suite 650
5 Las Vegas, Nevada 89101
6 702.626.4646
7 lance@maningolaw.com
8 Attorney for Defendant

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)
Plaintiff,) 2:19-cr-00265-RFB-VCF
vs.) (Third Request)
DANIELLE ESPARZA,)
Defendant.)
-----)

Certification: This Stipulation and Order is being timely filed.

STIPULATION TO CONTINUE SENTENCING

IT IS HEREBY STIPULATED AND AGREED, by Defendant DANIELLE ESPARZA, by and through her attorney, LANCE A. MANINGO, ESQ., and the United States of America, by and through KEVIN SCHIFF, Assistant United States Attorney, that the sentencing hearing currently scheduled for March 18, 2021, at 9:00 a.m. be vacated and continued to a date and time convenient for this Court; however, in no event earlier than thirty (30) days from the present date of sentencing.

This Stipulation is entered into for the following reasons:

1. The parties agree to continue the sentencing date as co-defendant Hurtado is still pending sentencing;
2. That Defendant ESPARZA is in custody and does not object to this continuance;

1 3. That denial of this request for a continuance could result in a miscarriage of
2 justice; and

2 4. This is the third request for a continuance of the sentencing date in this case.

3 RESPECTFULLY SUBMITTED this 9th day of March, 2021.

4 By: /s/ Lance Maningo
5 LANCE A. MANINGO, ESQ.
6 Attorney for Defendant ESPARZA

4 By: /s/ Kevin Schiff
5 KEVIN SCHIFF, AUSA
6 Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

1
2
3 THE UNITED STATES OF AMERICA,)
4 Plaintiff,) 2:19-cr-00265-RFB-VCF
5 vs.) (Third Request)
6 DANIELLE ESPARZA,)
7 Defendant.)
8 _____)

9 **FINDINGS OF FACTS**

10 Based upon the pending Stipulation of the parties, and good cause appearing therefore,
11 the Court finds that:

12 This Stipulation is entered into for the following reasons:

13

14 1. The parties agree to continue the sentencing date as co-defendant Hurtado is
15 still pending sentencing;

16 2. That Defendant ESPARZA is in custody and does not object to this
17 continuance;

18 3. That denial of this request for a continuance could result in a miscarriage of
19 justice; and

20 4. This is the third request for a continuance of the sentencing date in this case.

21 **CONCLUSIONS OF LAW**

22 The ends of justice served by granting said continuance outweigh the best interests of
23 the public and the defendant, since the failure to grant said continuance would be likely to
24 result in a miscarriage of justice.

25 / / / /

26 / / / /

27 / / / /

28 / / / /

ORDER

1
2 IT IS THEREFORE ORDERED that sentencing in this matter currently scheduled for
3 March 18, 2021 at 9:00 a.m. be vacated and continued to April 29, 2021 at 9:00 AM
4 in the above-noted Court.

5 DATED this 10th day of March, 2021.
6



7
8 RICHARD F. BOULWARE, II
9 UNITED STATES DISTRICT JUDGE
10
11

Respectfully submitted by:

12  **MANINGO LAW**
13 Est. 2002

14 By: /s/ Lance Maningo
15 Lance A. Maningo
16 Nevada Bar No. 6405
17 400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
Attorney for Defendant ESPARZA
18
19
20
21
22
23
24
25
26
27
28